



## Nebraska Public Power District

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Via email and hard copy

August 31, 2016

Gordon W. Fassett  
Nebraska Department of Natural Resources  
301 Centennial Mall South  
PO Box 94676  
Lincoln, NE 68509

RECEIVED

SEP 02 2016

DEPARTMENT OF  
NATURAL RESOURCES

Dear Mr. Fassett:

**Re: Central Platte NRD Transfer Applications, Thirty Mile Canal, Cozad Canal, and Orchard-Alfalfa Canal**

Nebraska Public Power District (NPPD) provides the following comments on applications NEX-5705 through NEX-5708 for the Orchard-Alfalfa Canal, NEX-5411 through NEX-5419 and NEX-5718 through NEX-5725 for the Thirty Mile Canal, and NEX-5476 through NEX-5483 and NEX-5730 through NEX-5736 for the Cozad Canal.

NPPD has reviewed the supplemental information and believes that it is imperative that all calculations used to determine the transfer rate be conducted individually for each transfer application. Specifically, the *Rate of Flow Augmentation* section combines all acres under the associated canal transfer applications, regardless of appropriation priority or the term of transfer, to compute the return rate. By doing this, the priority of the water right is ignored and acres that may have been using storage water would be calculated as returning natural flow to the river. Also that same section uses an average irrigation efficiency which is an average of averages. This may improperly weight the efficiency based on one transfer application out of the many transfer applications for the canal. If the calculations are instead done on an application by application basis, these problems can be avoided.

In reviewing the section, *Operations to Maintain Existing Recharge and Return*, in the Thirty Mile Canal supplemental information, the *Field Seepage or Deep Percolation* paragraph references information from the Orchard-Alfalfa application and NPPD cannot determine

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whether or not the Thirty Mile Canal will be able to recharge additional water to offset the reduction in field recharge.

Finally, NPPD has reviewed the historical canal start dates provided in the supplemental information and finds that all of the applications reference that diversions to wet the canals begin in "late May and early June". The historical canal diversion records do not support that claim. From 2001 to 2010, which are the last 10 years before recharge projects began, the canals' average start dates are May 21<sup>st</sup> for the Thirty Mile Canal, May 3<sup>rd</sup> for the Cozad Canal, and May 17<sup>th</sup> for the Orchard Alfalfa canal. The effect of assuming the start dates occur later than they historically did will cause recharge and river returns that occurred historically to be incorrectly credited as recharge or mitigation operations, thereby potentially harming existing users of that recharge water.

NPPD respectfully requests the above comments be considered during the Departments review of the applications. If you have any questions regarding the comments provided, please contact Jeff Shafer at (402) 362-7360 or myself at (402) 563-5335.

Sincerely,



Brian L. Barels  
Water Resources Manager

cc: Lyndon Vogt, Central Platte Natural Resources District  
Jeff Shafer